

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:  
  
ALL CASES

**DECLARATION OF SARAH R. LONDON  
IN SUPPORT OF ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE FILED UNDER SEAL**

I, Sarah R. London, declare:

1. I am an attorney in the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP, appointed Co-Lead counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of the State Bar of California and am admitted to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein

2. Because the material was designated confidential by Uber, Plaintiffs filed the following under seal:

Document	Description	Designating Party
Ex. 4 to Declaration of Roopal Luhana	A document created by Uber marked Highly Confidential – Attorneys' Eyes Only.	Uber
Ex. 7 to Declaration of Roopal Luhana	References to sealed material.	Uber
Ex. 8 to Declaration of Roopal Luhana	References to sealed material.	Uber
Ex. 9 to Declaration of Roopal Luhana	References to sealed material.	Uber

1	Ex. 10 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
2	Ex. 11 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
3	Ex. 12 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
4	Ex. 13 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
5	Ex. 14 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
6	Ex. 15 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
7	Ex. 16 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
8	Ex. 17 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
9	Ex. 18 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
10	Ex. 19 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
11	Ex. 20 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
12	Ex. 21 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
13	Ex. 22 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
14	Ex. 23 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
15	Ex. 24 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
16	Ex. 25 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
17	Ex. 26 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
18	Ex. 27 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
19	Ex. 28 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
20	Ex. 29 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
21	Ex. 30 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
22	Ex. 31 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
23	Ex. 32 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
24	Ex. 33 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
25	Ex. 34 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
26	Ex. 35 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
27	Ex. 36 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
28	Ex. 37 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber

1	Ex. 26 to Declaration of	A document produced by Uber	Uber
2	Roopal Luhana	in this litigation	
3	Ex. 27 to Declaration of	A document produced by Uber	Uber
4	Roopal Luhana	in this litigation	
5	Ex. 28 to Declaration of	A document produced by Uber in	Uber
6	Roopal Luhana	this litigation	
7	Ex. 29 to Declaration of	A document produced by Uber in	Uber
8	Roopal Luhana	this litigation	
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Ex. 40 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
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Ex. 46 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
Ex. 47 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
Ex. 48 to Declaration of Roopal Luhana	A document produced by Uber in this litigation	Uber
Ex. 49 to Declaration of Roopal Luhana	References to sealed material.	Uber

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of August, 2024 in San Francisco, CA.

/s/ Sarah R. London  
Sarah R. London